

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TRACY ELLIS	:	CIVIL ACTION
	:	
vs.	:	
	:	
HARTFORD COMPREHENSIVE	:	
EMPLOYEE BENEFITS SERVICE CO.	:	
DELAWARE MANAGEMENT	:	
HOLDING, INC., STD EMPLOYEE	:	
BENEFIT PLAN	:	NO. 02-cv-3623

**INITIAL DISCLOSURES OF DEFENDANT, HARTFORD  
COMPREHENSIVE EMPLOYEE BENEFITS SERVICE CO.**

**A. The Name and Last Known Address of Each  
Person Reasonably Likely to Have Information  
That Bears Significantly on the Claims**

1. Plaintiff.
2. The individuals identified in the entire administrative record which will be provided to all counsel

**B. All Documents, Data, Compilations , Etc., Likely to Bear  
Significantly On the Claims and Defenses**

The entire administrative record which includes the agreement between Delaware Management Holdings, Inc., and Hartford Comprehensive Employee Benefits Service Co., as well as the entire administrative record pertaining to Plaintiff's claim. These documents will be provided to all counsel.

**C. The Existence Of Any Insurance Agreement Under Which  
Any Person or Entity May Be Liable to Satisfy Part or All  
of a Judgment**

None.

Defendant reserves the right to supplement these disclosures.

**SWEENEY & SHEEHAN**

By: \_\_\_\_\_  
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